

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: David Frederick Ralls Jr**

**Debtor(s)**

**Wilmington Savings Fund Society, FSB, not in its  
individual capacity, but solely as trustee of MFA  
2023-INV1 Trust**

**Movant**

**vs.**

**David Frederick Ralls Jr**

**Respondent(s)**

**BK NO. 24-12228 AMC**

**Chapter 13**

**Hearing Date: 10/02/24**

**OBJECTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB, NOT IN ITS  
INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE OF MFA 2023-INV1 TRUST  
TO CONFIRMATION OF CHAPTER 13 PLAN**

Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee of MFA 2023-INV1 Trust (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On September 4, 2024, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$50,984.73.
2. Debtor's Plan provides for payment in the amount of \$24,643.76 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$26,340.97 and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee of MFA 2023-INV1 Trust, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: September 9, 2024

By: /s/ Denise Carlon  
Denise Carlon, Esquire  
KML Law Group, P.C.  
The Lits Building  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Movant/Applicant